

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MICHAELA BITTNER, ROGER CULLEN,
ERIC FISHON, BARRY GOLIN, LAURA
GONONIAN, ROBERT GUZIKOWSKI,
KATHLEEN HEVENER, IRMA LAWRENCE,
BRENT LONG, MARIA MAISTRO, PETER
MALDINI, DENITRICE MARKS, MARY
ANN MILLER, PAULA O'BRIEN, SUSAN
RAAB, ADAM ROPP, RICHARD RYANS,
JANEL SEMPRE, DAVID VIGGIANO, and
BRYAN WALLACE

Plaintiffs,

-against-

INTERNATIONAL BUSINESS MACHINES
CORPORATION,

Defendant.

Case No.: 20-mc-222

**NOTICE OF MOTION TO COMPEL INTERNATIONAL BUSINESS
MACHINES CORPORATION'S COMPLIANCE WITH
RULE 45(A)(1)(D) SUBPOENA DUCES TECUM**

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Motion to Compel International Business Machines Corporation's Compliance with Rule 45(a)(1)(D) Subpoena Duces Tecum, and the Attorney Declaration of Kelly K. Iverson, Esquire, in Support of Motion to Compel International Business Machines Corporation's Compliance with Rule 45(a)(1)(D) Subpoena Duces Tecum, along with the exhibits attached thereto, Plaintiffs Michaela Bittner, Roger Cullen, Eric Fishon, Barry Golin, Laura Gononian, Robert Guzikowski, Kathleen Hevener, Irma Lawrence, Brent Long, Maria Maistro, Peter Maldini, Denitric Marks, Mary Ann Miller, Paula O'Brien, Susan Raab, Adam Ropp, Richard Ryans, Janel Sempre, David

Viggiano, and Bryan Wallace, by and through their undersigned counsel, will and hereby move this Court before a Judge to be determined and at a date and time to be determined by the Court, for an Order Compelling International Business Machines Corporation's Compliance with Rule 45(a)(1)(D) Subpoena Duces Tecum, and for any such further relief as the Court deems just and proper.

Respectfully Submitted,

DATED: June 4, 2020

/s/

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